

JOINT DECLARATION OF CLASS COUNSEL

EXHIBIT C

STEMBER FEINSTEIN DOYLE & PAYNE, LLC

429 Forbes Avenue
 Allegheny Building, 17th Floor
 Pittsburgh, PA 15219

SUMMARY OF SOLUTIA TIME**REPORTING PERIOD: June 13, 2007 through July 29, 2008**

	<u>Fact Research</u>	<u>Legal Research</u>	<u>Pleadings</u>	<u>Discovery</u>	<u>Settlement</u>	<u>Total Hours</u>
<u>2007</u>						
June	-	7.50	9.20	-		16.70
July	2.60	11.50	23.75	-		37.85
August	0.30	1.20	0.50	-	6.40	8.40
September	2.70	-	7.30	-	16.10	26.10
October	7.20	5.80	34.95	-	30.95	78.90
November	7.40	0.50	67.25	-	50.40	125.55
December	1.80	-	-	-	20.00	21.80
						-
<u>2008</u>						-
January	-	-	-	-	16.20	16.20
February	1.10	3.50	-	-	40.05	44.65
March	-	-	-	-	23.70	23.70
April	-	-	-	-	14.40	14.40
May	0.90	-	-	-	9.85	10.75
June	-	-	-	-	0.60	0.60
July	0.25	-	-	-	1.55	1.80
Total Time	24.25	30.00	142.95	-	230.20	427.40

Re: Solutia Litigation

FEES SUMMARY

08/06/2008

STEMBER FEINSTEIN DOYLE and PAYNE, LLC

Bill Date	Staff	Total Dur	Rate/Price	Billed Amt	Description
08/01/07	EMD	0.50	\$ 475.00	\$ 237.50	Quick review of Graden v. Conexant decision and agree to send to Second Circuit
08/02/07	EMD	0.50	\$ 475.00	\$ 237.50	Letter to Second Circuit re: Conexant Systems case
08/14/07	EMD	0.40	\$ 475.00	\$ 190.00	Preparation for and attendance at TC with Ps' counsel re: what is status of settlement issues and issues going forward in the bankruptcy case
08/20/07	EMD	1.00	\$ 475.00	\$ 475.00	TC with Etkin and Sarraf and Gentile about settlement status/ Defs' new offer and developing a new demand/ TC with Sarraf Gentile afterwards/ E-mail to MDF to advise of status, providing 9019 information to Wahle
08/21/07	EMD	0.30	\$ 475.00	\$ 142.50	E-mails re responding to Wahle concerning the treatment of Stemme, also conf. with T. Schaeffer re: how to deal with this case administratively
08/31/07	EMD	5.00	\$ 475.00	\$ 2,375.00	Received counteroffer / Communicated with Joe Gentile / Analyzed docket of the Bankruptcy court and how to approach winning her approval of a settlement based on the current record before her
09/03/07	EMD	3.20	\$ 475.00	\$ 1,520.00	Reading important bankruptcy documents to reflect upon a proper settlement level and reasons
09/04/07	EMD	5.20	\$ 475.00	\$ 2,470.00	Analyzing facts available from bankruptcy document that support settlement before Judge Beatty
09/12/07	EMD	2.10	\$ 475.00	\$ 997.50	Work on memorandum re: reasons to approve settlement
09/12/07	EMD	0.40	\$ 475.00	\$ 190.00	Received latest offer from Ira / Reviewed offer / TC with Joe Gentile about how to respond
09/13/07	EMD	0.60	\$ 475.00	\$ 285.00	File management
09/14/07	EMD	1.10	\$ 475.00	\$ 522.50	E-mail from Finberg about procedures for settlement in bankruptcy case / TC with Stember, Finberg, Gentile, Etkin about a counter-proposal, other issues re: the structure of the settlement, etc.
09/18/07	EMD	0.20	\$ 475.00	\$ 95.00	Started reading and analyzing Northern Trust's submissions
09/19/07	EMD	0.50	\$ 475.00	\$ 237.50	Reading new motions to dismiss and attachments
09/20/07	EMD	3.60	\$ 475.00	\$ 1,710.00	Worked through the Defs' motions for summary judgment and attachments to determine what we had already briefed, what was new, and what needed to be updated / TC with Sarraf and P. Ewing to discuss strategy re: briefing and settling the whole matter
09/21/07	EMD	2.10	\$ 475.00	\$ 997.50	Reading and analyzing new filings in bankruptcy for any information that would be useful in settling this case
09/24/07	EMD	1.10	\$ 475.00	\$ 522.50	TC with Etkin, Sarraf and Gentile about the settlement status / Preparation for potential settlement and what to do about pending motions to dismiss / Work on what papers should look like and include
09/25/07	EMD	0.30	\$ 475.00	\$ 142.50	Review and memo to Sarraf about issues related to draft MOU

Re: Solutia Litigation

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STEMBER FEINSTEIN DOYLE and PAYNE, LLC

Bill Date	Staff	Total Dur	Rate/Price	Billed Amt	Description
09/26/07	EMD	0.90	\$ 475.00	\$ 427.50	Comments to Sarraf about draft MOU / TC with Etkin, Levin, et al re: the progress of the settlement discussions and how to proceed in negotiations and procedures
09/28/07	EMD	0.40	\$ 475.00	\$ 190.00	TC with Etkin / Communications with Sarraf /Gentile re: how to get the matter settled and what happens next
10/01/07	EMD	1.20	\$ 475.00	\$ 570.00	TC with Etkin / TC with Wahle / Memo to team re: settlement issues re: how to proceed, what insurance policy does and does not allow, etc.
10/03/07	EMD	0.30	\$ 475.00	\$ 142.50	TC with Gentile re: how to proceed and thinking about same re: settlement and TC with defendants tomorrow
10/04/07	EMD	2.25	\$ 475.00	\$ 1,068.75	Preparation for settlement discussions reviewing the prior negotiations, the issues raised by Wahle / TC with Sarraf Gentile and J. Hurt and J. Stember to discuss approach to settlement conf. / Settlement phone conf. with Solutia's in-house counsel, bankruptcy counsel, Wahle and partner for district court defendants, Etkin, Sarraf/Gentile, J. Hurt and J. Stember to discuss status of negotiations, issues and concerns, what can be done in bankruptcy proceedings, what can be done with regards to carrier, what has to be done to protect the plan, etc. / conf. call afterwards to discuss with Sarraf and Gentile the issues presented
10/08/07	EMD	0.40	\$ 475.00	\$ 190.00	TC with Joe Gentile about what Karen Wahle's issues are and whether and how to address
10/09/07	EMD	1.10	\$ 475.00	\$ 522.50	C with Debtor's counsel -- Adams and Fritschberg -- plus Wahle and OMM lawyers, plus Etkin and Sarraf Gentile to discuss where we are on possibility of settlement, their communications with Chubb, Etkin's further explanation of form of proceeding, other issues such as Rule 23, whether fairness hearing could be done before Judge Beatty, Chubb's need for damages analysis, our need for documents to perform damages analysis, and other matters / TC afterwards with Sarraf Gentile to discuss how to proceed
10/09/07	EMD	0.60	\$ 475.00	\$ 285.00	E-mail to Wahle / Return TC from Wahle / Discussion of form of settlement and her issues and concerns re: individual defendants / E-mail to P's team about the TC with Wahle
10/09/07	EMD	0.60	\$ 475.00	\$ 285.00	TC with Etkin and Sarraf Gentile to discuss how to proceed towards at least settlement in Chapter 11 proceeding and approach to phone call in afternoon with debtor's counsel and Wahle
10/10/07	EMD	0.40	\$ 475.00	\$ 190.00	TC with Gentile re: how to approach individual defendants and start on letter to Wahle re: same

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Bill Date	Staff	Total Dur	Rate/Price	Billed Amt	Description
10/11/07	EMD	3.10	\$ 475.00	\$ 1,472.50	Development of draft settlement demand letter for Wahle
10/12/07	EMD	2.70	\$ 475.00	\$ 1,282.50	More work on the Wahle draft letter-- including incorporating Joel's thoughts, adding in more information on the losses and on the source of information / conf. with J. Hurt about issues / TC with Sarraf Gentile about issues / E-mail to Etkin for approval / E-mail to Finberg re: status of negotiations
10/15/07	EMD	1.40	\$ 475.00	\$ 665.00	Draft of letter to Wahle re: settlement, including incorporating new info from Disclosure Statement, and communications with co-counsel about same
10/15/07	EMD	3.40	\$ 475.00	\$ 1,615.00	Read Disclosure statement and informed co-counsel of problems with changes made re: Dickerson/Reiff claim
10/16/07	EMD	0.60	\$ 475.00	\$ 285.00	Corrections and revisions to letter to Wahle formulating demand
10/16/07	EMD	3.20	\$ 475.00	\$ 1,520.00	Read and analyzed full text of new Plan of Reorganization / E-mail memo to team about concerns re: how claims and insurance are to be treated
10/17/07	EMD	0.50	\$ 475.00	\$ 237.50	Arrangements to go to NYC
10/17/07	EMD	1.10	\$ 475.00	\$ 522.50	Work on response to Solutia defendants' motion to dismiss-- factual assertions in Wahle brief-- and checking certain assertions re: the SPDs and Plan documents
10/17/07	EMD	3.70	\$ 475.00	\$ 1,757.50	TC with R. Sarraf and Mickey / E-mails to team re: status of the disclosure statement issues and objections plus re-reading and checking against the new blacklined version of the Disclosure Statement
10/18/07	EMD	1.70	\$ 475.00	\$ 807.50	Reading more carefully the black-lined version of disclosure statement / Communications re: what to do re: disclosure statement vs. confirmation
10/19/07	EMD	8.00	\$ 475.00	\$ 3,800.00	Travel to NYC for bankruptcy hearing / Meeting with Levee / Short conf. with Debtor's counsel / Travel back to Pittsburgh
10/22/07	EMD	4.10	\$ 475.00	\$ 1,947.50	Communications with the team, including by e-mail and TCs / TCs with Etkin / TC with K. Wahle, strategizing about where to move in response to Debtors' conversation with Etkin about settlement
10/23/07	EMD	4.90	\$ 475.00	\$ 2,327.50	Organizing the briefing of the motion to dismiss-- including ideas for new topics to cover, drafting new improved statement of the facts alleged and of facts gleaned from document exhibits
10/24/07	EMD	5.20	\$ 475.00	\$ 2,470.00	Work on fact section of the brief, on Dickerson section of the brief, then research on tolling issues
10/25/07	EMD	1.10	\$ 475.00	\$ 522.50	Quick review of the draft brief in opposition to motion to dismiss / conf. with P. Ewing re statute of limitations issues and questions and e-mails about same

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Bill Date	Staff	Total Dur	Rate/Price	Billed Amt	Description
10/29/07	EMD	1.10	\$ 475.00	\$ 522.50	Rest up and attended TC with Etkin et al re: status of negotiations and where to go next, later in day e-mails about other work to be done re: objections, classification, strategies in Chapter 11 proceedings
10/30/07	EMD	0.60	\$ 475.00	\$ 285.00	File organization and review tasks
11/01/07	EMD	2.90	\$ 475.00	\$ 1,377.50	Updating research and editing brief in opposition to motion to dismiss
11/02/07	EMD	2.50	\$ 475.00	\$ 1,187.50	More edits to the brief, read and analyzed statute of limitations section drafted by P. Ewing / conf. with P. Ewing, J. Hurt and R. Sarraf on statute of limitations and other issues among the group re: brief and work assignments
11/06/07	EMD	1.80	\$ 475.00	\$ 855.00	TC with Mickey about technical questions raised by Debtors counsel re: settlement speed and procedures, and whether we could work with those, work assignments and work to consider how to proceed quickly if matter settles, including review of draft from Ronen, communicating with MDF and Finberg, and dealing with a Finberg inquiry to Etkin
11/07/07	EMD	0.40	\$ 475.00	\$ 190.00	Monitoring docket on bankruptcy
11/07/07	EMD	0.50	\$ 475.00	\$ 237.50	Quick review and edit of J. Hurt's draft of the opposition to motion to dismiss
11/08/07	EMD	0.20	\$ 475.00	\$ 95.00	Work and issues re: opposition to motion to dismiss
11/08/07	EMD	0.50	\$ 475.00	\$ 237.50	Monitoring the docket filings
11/08/07	EMD	1.10	\$ 475.00	\$ 522.50	Work on edits and comments to Sarraf draft, including memo to team
11/09/07	EMD	0.80	\$ 475.00	\$ 380.00	Monitoring docket and new filings, comments and suggestions and responding to inquiries re: proposed settlement
11/12/07	EMD	2.90	\$ 475.00	\$ 1,377.50	Work on Dickerson brief re: statute of limitations including mark-up of P. Ewing's draft / Research and analysis of cases cited by Defs or in our drafts that needed to be distinguished more, also inclusion of more case law re: generally six year rather than three year limitation period / conf.s with J. Hurt re: approach to argument
11/13/07	EMD	0.60	\$ 475.00	\$ 285.00	Review and comments on Statute of Limitations section latest draft for opposition brief / conf. with J. Hurt re: how to handle issues related to Dickerson / Communications with all counsel re: how to handle the possibility of amendment to add company
11/13/07	EMD	2.40	\$ 475.00	\$ 1,140.00	Communications with and re: settlement, including TCs with Levee, TC with Etkin, communication to team about what Etkin learned from Adams, analysis of POR indemnification provision in response to inquiry from Finberg, discussion of status of negotiations with J. Stember

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Bill Date	Staff	Total Dur	Rate/Price	Billed Amt	Description
11/14/07	EMD	1.90	\$ 475.00	\$ 902.50	TCs and communications about settlement issues, concerns and how to promote
11/16/07	EMD	0.70	\$ 475.00	\$ 332.50	Comments about the levee draft of the protective objection / Communications among team re issues raised
11/19/07	EMD	0.60	\$ 475.00	\$ 285.00	Docket monitoring, keeping track of all the new filings
11/19/07	EMD	1.60	\$ 475.00	\$ 760.00	E-mails and communications among plaintiffs' team / TC with Etkin and team to discuss status of settlement discussions and how to proceed, communications about proposed draft objection and what should and should not be in it.
11/20/07	EMD	0.60	\$ 475.00	\$ 285.00	Docket monitoring - checking all new filings for relevancy related to this claim, also reading new supplemental POR docs
11/20/07	EMD	2.10	\$ 475.00	\$ 997.50	Communications with Etkin re settlement discussions and issues / TC with Wahle re settlement discussions with Chubb / TC with Gentile about how to respond
11/21/07	EMD	1.20	\$ 475.00	\$ 570.00	Monitoring the many filings for relevancy, comments on the Dickerson/Reiff protective objection
11/21/07	EMD	4.10	\$ 475.00	\$ 1,947.50	This is work for settlement of Reiff and Dickerson on appeal -- efforts to settle, including TCs with Wahle, Gentile, Etkin / conf. with J. Stember / Preparation for settlement meeting in D.C. on Nov. 26
11/26/07	EMD	13.00	\$ 475.00	\$ 6,175.00	Travel to D.C. / Meet with Joe Gentile, then meet with Wahle and Hogan and Hartson to discuss settlement / Meeting afterwards with Gentile / TCs to Etkin / (extended period) to fly back from D.C. to Pittsburgh because of travel hassles
11/27/07	EMD	0.60	\$ 475.00	\$ 285.00	Analyzed La Rue motion decision / Draft letter to Second Circuit
11/27/07	EMD	1.20	\$ 475.00	\$ 570.00	Trying to monitor the filings for relevancy
11/27/07	EMD	1.70	\$ 475.00	\$ 807.50	Settlement issues and communications with Etkin, Sarraf Gentile, including terms for review with the court
11/27/07	EMD	1.50	\$ 475.00	\$ 712.50	Settlement strategy discussions with J. Stember, J. Hurt and Gentile and Sarraf / TCs with Wahle and e-mail exchanges
11/28/07	EMD	1.50	\$ 475.00	\$ 712.50	Monitoring of all the newly filed documents related to our case and issues
11/28/07	EMD	3.10	\$ 475.00	\$ 1,472.50	Working on proposals and counter-proposals to Wahle for settlement of Dickerson/Reiff
11/28/07	EMD	4.90	\$ 475.00	\$ 2,327.50	Work on specifics of settlement including responding to drafts for presentation to Judge Beatty and travel to NYC for bankruptcy hearing on confirmation where proposed settlement of claim is to be made
11/29/07	EMD	0.60	\$ 475.00	\$ 285.00	Attempt to settle with Wahle / conf.s with Sarraf Gentile re same

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Bill Date	Staff	Total Dur	Rate/Price	Billed Amt	Description
11/29/07	EMD	8.60	\$ 475.00	\$ 4,085.00	Travel to NYC for confirmation hearing / Met with Sarraf Gentile and Mickey Etkin / Review of documents provided by debtors' counsel / Meeting afterwards with Sarraf Gentile to discuss work to be done and assignments / Travel back to Pittsburgh
11/30/07	EMD	0.90	\$ 475.00	\$ 427.50	TC with J. Hurt re status of the settlement / TC with Gentile re: how to approach settlement issue / conf. with J. Sember re how to settle
11/30/07	EMD	0.40	\$ 475.00	\$ 190.00	Monitoring docket
12/03/07	EMD	0.40	\$ 475.00	\$ 190.00	Read and analyzed the letter Wahle sent to court
12/03/07	EMD	0.40	\$ 475.00	\$ 190.00	Monitoring docket
12/03/07	EMD	0.60	\$ 475.00	\$ 285.00	Settlement related communications
12/04/07	EMD	1.70	\$ 475.00	\$ 807.50	Decision to try again to settle Dickerson Reiff claims- - TCs with Sarraf Gentile, Wahle, Malakoff to discuss terms and conditions, negotiations with Wahle
12/04/07	EMD	1.30	\$ 475.00	\$ 617.50	Issues related to the bankruptcy proceeding, the terms of the draft settlement, timing, and other practices and procedures
12/05/07	EMD	0.90	\$ 475.00	\$ 427.50	File management and controls, checking docket, supervising filing
12/06/07	EMD	0.30	\$ 475.00	\$ 142.50	Msg from Wahle re settling, communications with team about same
12/07/07	EMD	1.40	\$ 475.00	\$ 665.00	Settlement issues, including e-mails with team / TC with Wahle / TCs and e-mails to keep everyone updated
12/10/07	EMD	2.30	\$ 475.00	\$ 1,092.50	TCs with Wahle, Etkin, Sarraf Gentile / E-mails among group / TC to Second Circuit / Draft letter to Second Circuit re potential settlement, informing courts, finalizing papers, schedules, etc.
12/11/07	EMD	2.80	\$ 475.00	\$ 1,330.00	Work on settlement papers including TC with Solutia, Dickerson's counsel, Northern Trust's counsel, Etkin and Plaintiffs' counsel, communications with all re the settlement papers, timing and form of settlement, etc.
12/12/07	EMD	0.60	\$ 475.00	\$ 285.00	Monitoring filings, e-mails with team and Mickey Etkin about status of settlement papers and issues
12/14/07	EMD	0.60	\$ 475.00	\$ 285.00	Work on comments and critique of settlement papers, issues re: how to proceed
12/17/07	EMD	0.60	\$ 475.00	\$ 285.00	TCs and e-mails with team re: Judge Beatty chambers TC plus monitoring docket
12/18/07	EMD	0.70	\$ 475.00	\$ 332.50	TC about Beatty's desire to have district court approve settlement / TC with Sarraf and Etkin / conf. with J. Hurt re same / TC with Wahle about issue of DOL no-action letter, question of how to address
12/23/07	EMD	0.20	\$ 475.00	\$ 95.00	Update to lawyers of changes in settlement perspective and work to be done and when

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Bill Date	Staff	Total Dur	Rate/Price	Billed Amt	Description
12/26/07	EMD	1.40	\$ 475.00	\$ 665.00	Review of the settlement drafts prepared by Ronen / Wuestions and issues for him / Supervising sending drafts out to Defendants
01/18/08	EMD	0.90	\$ 475.00	\$ 427.50	Began particularized review of the settlement draft from Ds'
01/19/08	EMD	1.30	\$ 475.00	\$ 617.50	Read carefully Defs' draft of settlement agreement and related papers / Memo to team re issues and concerns relating to changes
01/22/08	EMD	1.40	\$ 475.00	\$ 665.00	Worked through comments by J. Hurt, R. Sarraf and E. Doyle on draft settlement papers from Defs / Communications about how to describe issues and concerns
01/23/08	EMD	0.60	\$ 475.00	\$ 285.00	Settlement disputes and issues-- communications with Sarraf about Wahle's concerns and our issues related to same
01/24/08	EMD	0.70	\$ 475.00	\$ 332.50	Communications with defense counsel / TC with Wahle and Sarraf re issues to be resolved for purposes of settlement / TC afterwards with Sarraf, attempt to reach DOL's Milgrim
01/31/08	EMD	1.80	\$ 475.00	\$ 855.00	Read latest version of settlement agreement and noted issues, tic with Solutia's counsel, Wahle, Etkin, Sarraf and Hurt to discuss remaining issues re: draft settlement papers, communications afterwards among pHs' counsel to address issues raised during conf. including Dickerson's treatment, and multiple distributions problem
02/01/08	EMD	0.60	\$ 475.00	\$ 285.00	Comments on drafts and communications with Defs / TC with Milgrim
02/04/08	EMD	0.40	\$ 475.00	\$ 190.00	Update on status of settlement -- with J. Hurt, then e-mails with Wahle re communications with DOL
02/07/08	EMD	5.20	\$ 475.00	\$ 2,470.00	Work on settlement issues, including TC with Wahle about Solutia's financial condition and exit financing problems / TC with Sarraf about same / TC with Colin and Albie to discuss exit financing issues as well as how to deal with Dickerson appeal issue / TC with Ps' team including Etkin to discuss bankruptcy issues / TC with Wahle and DOL about no action letter, and drafting memo of proposed edits to proposed settlement agreement to meet concerns
02/08/08	EMD	0.30	\$ 475.00	\$ 142.50	Communications with co-counsel about pending issues re settlement
02/10/08	EMD	0.50	\$ 475.00	\$ 237.50	Review of SPD produced by Wahle / Email memo about concerns to team
02/11/08	EMD	2.10	\$ 475.00	\$ 997.50	Communications about draft settlement papers and then TC with all Ps' counsel to discuss issues, questions and suggested language changes to provide new draft to defendants, and to discuss issues related to failure of exit financing with Etkin

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Bill Date	Staff	Total Dur	Rate/Price	Billed Amt	Description
02/13/08	EMD	3.20	\$ 475.00	\$ 1,520.00	Solutia settlement review of new proposed comments from Solutia's counsel, strategy sessions with Hurt and Sarraf Gentile, then tic with all of defense counsel, then tic with Sarraf Gentile and Hurt about how to move forward, tic with Jeff Zeiger, and e-mail to team, also throughout consideration of how to address the problems with exit financing, whether that affects whole deal, what protections could be written in, etc.
02/14/08	EMD	3.20	\$ 475.00	\$ 1,520.00	Read and analyzed cases provided by Solutia then independent research on the issues related to remand and consolidation
02/15/08	EMD	1.30	\$ 475.00	\$ 617.50	TCs with Sarraf Gentile and Hurt about problems with bankruptcy emergence and Etkin conversation with Adams and possible provisions to address and issue of Dickerson litigation and what research has shown so far
02/21/08	EMD	1.40	\$ 475.00	\$ 665.00	TC with Wahle, e-mail to team about conversation with Wahle, TC and conf. re La Rue footnote and the effect on participant status
02/22/08	EMD	0.90	\$ 475.00	\$ 427.50	TC with all Ps' counsel to discuss how to proceed in light of bankruptcy emergence problems, also comments on communications with court and defense
02/25/08	EMD	0.60	\$ 475.00	\$ 285.00	Trying to keep up with what is happening on exit financing and where we are going
02/26/08	EMD	0.50	\$ 475.00	\$ 237.50	E-mails and reading about status of exit financing and issues re: going forward with settlement
03/04/08	EMD	0.60	\$ 475.00	\$ 285.00	Review of latest draft of settlement papers with Wahle comments
03/05/08	EMD	1.20	\$ 475.00	\$ 570.00	Comments to team about Wahle comments to settlement agreement / TC with co-counsel to address how to proceed in light of Wahle obstructions to settlement
03/06/08	EMD	1.90	\$ 475.00	\$ 902.50	TCs with Sarraf Gentile, followed by TC with Zieger for Debtor, followed by TC with Ps' counsel to try to get past impasse re: settlement
03/13/08	EMD	2.10	\$ 475.00	\$ 997.50	Review of latest draft from Ronen of proposed settlement / Sent comments to him / TC with R. Sarraf, M. Etkin and J. Hurt to discuss new draft before sending it to all defense counsel
03/18/08	EMD	1.60	\$ 475.00	\$ 760.00	Conf. call to work out differences re: settlement and conf. afterwards with Sarraf Gentile
03/20/08	EMD	0.70	\$ 475.00	\$ 332.50	Quick review of latest draft of Solutia settlement papers with changes proposed by Zieger
03/21/08	EMD	1.25	\$ 475.00	\$ 593.75	TC with Zeiger, Dell, Etkin, Sarraf to review Zieger's latest draft of the complaint, tm from Wahle as to why she failed to attend

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Bill Date	Staff	Total Dur	Rate/Price	Billed Amt	Description
03/24/08	EMD	1.90	\$ 475.00	\$ 902.50	Preparation for and attendance at prolonged settlement TC where issues resurfaced
03/25/08	EMD	3.10	\$ 475.00	\$ 1,472.50	TC with Zieger / TC with Norman Goldberg and David Cohn / TC with Sarraf Gentile and Mickey Etkin to try to resolve differences for purposes of settlement
03/27/08	EMD	0.30	\$ 475.00	\$ 142.50	Communications and e-mails re: settlement issues
03/28/08	EMD	1.30	\$ 475.00	\$ 617.50	Preparation for, extended TC re: Solutia settlement trying to iron out the remaining issues, and TC afterwards with S. Gentile
04/09/08	EMD	0.30	\$ 475.00	\$ 142.50	TCs with Sarraf about finalizing settlement
04/10/08	EMD	0.30	\$ 475.00	\$ 142.50	E-mails about resolving settlement issues
04/14/08	EMD	0.60	\$ 475.00	\$ 285.00	E-mails with Sarraf Gentile about work to be done / Conf. with Hurt about work to be done on exhibits to settlement agreement
05/06/08	EMD	0.50	\$ 475.00	\$ 237.50	More last minute adjustments in the settlement agreement
05/08/08	EMD	0.40	\$ 475.00	\$ 190.00	Communications re: narrowing settlement issues
05/12/08	EMD	0.90	\$ 475.00	\$ 427.50	TC with all plaintiffs' counsel to respond and be ready for issues at TC with all defense counsel re: clean-up on settlement
05/13/08	EMD	0.70	\$ 475.00	\$ 332.50	TC with Ronen, then with all parties to discuss finalizing settlement, then with Ronen afterwards, e-mail to Wahle
05/14/08	EMD	0.40	\$ 475.00	\$ 190.00	More settlement skirmishes and communications
05/16/08	EMD	0.50	\$ 475.00	\$ 237.50	TC with Sarraf Gentile / Conf. with J. Hurt re new snafu in settlement and how to address
05/20/08	EMD	0.30	\$ 475.00	\$ 142.50	Conf. with Judge Preska's chambers / TC with Sarraf Gentile afterwards
05/26/08	EMD	0.90	\$ 475.00	\$ 427.50	Supervision of file management
05/28/08	EMD	0.40	\$ 475.00	\$ 190.00	Communications re settlement, including TC with Sarraf and then TC with US Trust's Cohen
06/05/08	EMD	0.40	\$ 475.00	\$ 190.00	Settlement filing and order / Review and communications with co-counsel
06/20/08	EMD	0.20	\$ 475.00	\$ 95.00	Communications with Sarraf about summary notice issue
07/29/08	EMD	0.60	\$ 475.00	\$ 285.00	TC with Gilardi and Mercer to discuss data issues re: settlement implementation
07/29/08	EMD	0.60	\$ 475.00	\$ 285.00	TC with Sarraf re: settlement papers, and work assignments, providing materials for Ewing re: same
Ellen M. Doyle		217.10	\$	103,122.50	
09/14/07	JS	0.40	\$ 475.00	\$ 190.00	Participate in conf. call

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10/22/07	JS	1.50	\$ 475.00	\$ 712.50	2 TC with E. Doyle, J. Hurt, R. Sarraf, Gentile and Etkin re: settlement negotiations / TC with E. Doyle, J. Hurt, R. Sarraf and Gentile re: the same / Discussion with E. Doyle and J. Hurt re: the same
John Stember		1.90		\$ 902.50	
07/03/07	PE	0.25	\$ 425.00	\$ 106.25	Meet with S. Pincus re: Section 510(b) matter / Review email messages re: status of same
07/18/07	PE	6.00	\$ 425.00	\$ 2,550.00	Review pleadings/ Meet with E. Doyle, et al re: subordination issue/ Review subordination issue/ Draft brief section re: subordination
07/19/07	PE	7.50	\$ 425.00	\$ 3,187.50	Research / Draft brief sections on subordination / Meet with E. Doyle, et al re: same / Email re: same
07/20/07	PE	7.00	\$ 425.00	\$ 2,975.00	Research / Draft and revise brief on subordination issue / Meet with and TCs with E. Doyle and J. Hurt
07/23/07	PE	2.50	\$ 425.00	\$ 1,062.50	conf. call re: brief / Review and revise brief
07/24/07	PE	0.10	\$ 425.00	\$ 42.50	Update case status
07/27/07	PE	0.20	\$ 425.00	\$ 85.00	TC with E. Doyle and R. Sarraf re 7.26.07 hearing
09/18/07	PE	1.50	\$ 425.00	\$ 637.50	Review briefs in support of motions to dismiss
09/20/07	PE	1.50	\$ 425.00	\$ 637.50	Review briefs in support of motions to dismiss / conf. call re: same
10/16/07	PE	0.30	\$ 425.00	\$ 127.50	Email re: statute of limitations issue
10/23/07	PE	1.50	\$ 425.00	\$ 637.50	Review briefs in support of motions to dismiss / Email re: same
10/24/07	PE	2.50	\$ 425.00	\$ 1,062.50	Research for statute of limitations argument
10/25/07	PE	3.00	\$ 425.00	\$ 1,275.00	Review facts and law for tolling issue / Email re: same / Research for statute of limitations issues generally
10/31/07	PE	6.00	\$ 425.00	\$ 2,550.00	Draft brief section on statute of limitations / Research for same
11/01/07	PE	2.25	\$ 425.00	\$ 956.25	Research for and draft brief section
11/12/07	PE	0.75	\$ 425.00	\$ 318.75	Review and revise brief section / Review email comments re: same
11/13/07	PE	0.40	\$ 425.00	\$ 170.00	conf. with E. Doyle, P. Ewing, R. Sarraf and Gentile
Pamina Ewing		43.25		\$ 18,381.25	
06/13/07	SMP	3.50	\$ 425.00	\$ 1,487.50	Review complaint / Legal research / draft memorandum re: s/l
06/14/07	SMP	2.00	\$ 425.00	\$ 850.00	Continue drafting memorandum re: statute of limitations
06/18/07	SMP	3.30	\$ 425.00	\$ 1,402.50	Review file / Begin work on opposition
06/21/07	SMP	2.50	\$ 425.00	\$ 1,062.50	Continue research on opposition
06/22/07	SMP	3.40	\$ 425.00	\$ 1,445.00	Continue research on opposition
06/25/07	SMP	2.00	\$ 425.00	\$ 850.00	Continue legal research
07/02/07	SMP	5.00	\$ 425.00	\$ 2,125.00	Research

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07/03/07	SMP	4.50	\$ 425.00	\$ 1,912.50	Research
07/05/07	SMP	2.00	\$ 425.00	\$ 850.00	Research
07/20/07	SMP	0.30	\$ 425.00	\$ 127.50	Review P. Ewing's brief
Stephen M. Pincus		28.50		\$ 12,112.50	
07/18/07	JC	1.00	\$ 390.00	\$ 390.00	Reviewed bankruptcy filings / Attended meeting
Jonathan Cohn		1.00		\$ 390.00	
08/01/07	JRH	0.50	\$ 375.00	\$ 187.50	Review and analyze opinion on ERISA standing
08/02/07	JRH	0.10	\$ 375.00	\$ 37.50	Download Graden decision to provide to 2d Circuit
08/15/07	JRH	0.10	\$ 375.00	\$ 37.50	Retrieve and review 6th Circuit decision in AEP ERISA Litigation on former participant standing under ERISA
09/24/07	JRH	0.50	\$ 375.00	\$ 187.50	TC with Doyle, Sarraf, Gentile, Etkin re: settlement negotiations
09/26/07	JRH	0.50	\$ 375.00	\$ 187.50	TC with E. Doyle, R. Sarraf, J. Gentile, M. Etkin re: settlement
10/03/07	JRH	0.10	\$ 375.00	\$ 37.50	Discuss and review email of E. Doyle re: her conversation with K. Wahle re: settlement negotiations
10/04/07	JRH	2.25	\$ 375.00	\$ 843.75	TC with E. Doyle, R. Sarraf and Gentile to prepare for call with defense counsel / TC with E. Doyle, J. Stember, R. Sarraf, Gentile, Etkin, Etkin's insurance coverage partner, Adams, Frischberg, Mooney, Wahle and Wahle's bankruptcy partner re: settlement / TC with Doyle Sarraf and Gentile following call / Internet research re: Tim Mooney / TC with Gentile
10/09/07	JRH	1.75	\$ 375.00	\$ 656.25	C Doyle, Sarraf, Gentile and Etkin to prepare for settlement discussions / TC all counsel re: settlement discussions / TC Doyle Sarraf and Gentile to follow-up
10/12/07	JRH	0.25	\$ 375.00	\$ 93.75	Review and edit letter E. Doyle to K. Wahle
10/16/07	JRH	3.75	\$ 375.00	\$ 1,406.25	TC with E. Doyle, R. Sarraf, Gentile and Etkin re bankruptcy and settlement discussions
10/22/07	JRH	1.50	\$ 375.00	\$ 562.50	2 TC with E. Doyle, J. Stember, R. Sarraf, Gentile and Etkin re: settlement negotiations / TC with E. Doyle, J. Stember, R. Sarraf and Gentile re: the same / Discussion with E. Doyle and J. Stember re: the same
10/25/07	JRH	1.25	\$ 375.00	\$ 468.75	Review of draft opposition to motion to dismiss and prepare email re: statute of limitations arguments
11/01/07	JRH	1.75	\$ 375.00	\$ 656.25	Review and analyze draft brief in opposition to motion to dismiss
11/02/07	JRH	6.00	\$ 375.00	\$ 2,250.00	Review, analyze and edit draft brief in opposition to motion to dismiss / Related research / TC with E. Doyle, P. Ewing, R. Sarraf and Gentile re: same

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Bill Date	Staff	Total Dur	Rate/Price	Billed Amt	Description
11/05/07	JRH	6.00	\$ 375.00	\$ 2,250.00	Review, analyze and edit draft brief in opposition to motion to dismiss as to Solutia Defendants' arguments / Related research
11/06/07	JRH	0.25	\$ 375.00	\$ 93.75	TC with co-counsel re: settlement discussions
11/06/07	JRH	5.75	\$ 375.00	\$ 2,156.25	Review and edit brief in opposition to motions to dismiss
11/07/07	JRH	5.75	\$ 375.00	\$ 2,156.25	Review and prepare revisions brief in opposition to motion to dismiss / Related research
11/08/07	JRH	2.50	\$ 375.00	\$ 937.50	Review and analyze draft settlement papers and related emails
11/09/07	JRH	4.50	\$ 375.00	\$ 1,687.50	Review and edit draft settlement papers
11/12/07	JRH	8.75	\$ 375.00	\$ 3,281.25	Revisions to opposition to motions to dismiss / Related research on statute of limitations and tolling
11/13/07	JRH	8.25	\$ 375.00	\$ 3,093.75	Revisions to opposition to motion to dismiss / Related research
11/15/07	JRH	1.00	\$ 375.00	\$ 375.00	Review and propose edits to opposition to motions to dismiss / Related research
11/19/07	JRH	0.50	\$ 375.00	\$ 187.50	TC with co-counsel re settlement discussions
11/26/07	JRH	2.00	\$ 375.00	\$ 750.00	Review and analyze proposed amendment to DOL class exemption from prohibited transaction related to fiduciary breach claims / Email to co-counsel re same
11/27/07	JRH	0.25	\$ 375.00	\$ 93.75	TC with co-counsel re settlement discussions
11/27/07	JRH	0.50	\$ 375.00	\$ 187.50	Review supreme court docket of LaRue v. DeWolf re motion to dismiss cert. based on standing / Email to co-counsel re same
12/04/07	JRH	0.50	\$ 375.00	\$ 187.50	Review and analyze draft settlement agreement and exhibits
12/06/07	JRH	0.10	\$ 375.00	\$ 37.50	Review Wahle letter to 2nd Circuit
12/11/07	JRH	1.50	\$ 375.00	\$ 562.50	Review term sheet/ TC with all counsel re settlement / Review and analyze Solutia's edits to settlement stipulation and order
12/14/07	JRH	2.75	\$ 375.00	\$ 1,031.25	Review, comment and edit draft settlement papers
12/18/07	JRH	0.25	\$ 375.00	\$ 93.75	Review and respond to emails concerning settlement status
01/20/08	JRH	4.00	\$ 375.00	\$ 1,500.00	Review and analyze draft settlement agreement and plan of allocation
01/21/08	JRH	1.00	\$ 375.00	\$ 375.00	Review ancillary settlement papers
01/22/08	JRH	2.00	\$ 375.00	\$ 750.00	Review defendant's mark-up to draft settlement papers and review preliminary order and plan of allocation / TC with E. Doyle and R. Sarraf / Review and respond to R. Sarraf email with draft correspondence to defense counsel
01/25/08	JRH	0.50	\$ 375.00	\$ 187.50	Review Wahle's mark-up of plan of allocation and emails from co-counsel re: settlement
01/31/08	JRH	2.00	\$ 375.00	\$ 750.00	Review and analyze revised settlement agreement / TC with all counsel re: same

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02/05/08	JRH	0.25	\$ 375.00	\$ 93.75	Review and respond to emails from co-counsel re: remand of Dickerson case
02/07/08	JRH	6.50	\$ 375.00	\$ 2,437.50	TC with Solutia attorneys and co-counsel re: settlement and bankruptcy update / TC with co-counsel re: settlement / Revisions to settlement agreement / TC with E. Doyle, Wahle and DOL representatives
02/08/08	JRH	5.40	\$ 375.00	\$ 2,025.00	Prepare revisions to settlement agreement
02/09/08	JRH	6.25	\$ 375.00	\$ 2,343.75	Review comments and proposed revisions from Doyle, Sarraf and Etkin / Prepare revisions to settlement agreement
02/11/08	JRH	3.00	\$ 375.00	\$ 1,125.00	Prepare revisions to Settlement Agreement and Plan of Allocation and related emails to co-counsel
02/13/08	JRH	2.00	\$ 375.00	\$ 750.00	Review defense counsel's mark-up to settlement agreement / TC with plaintiff's counsel / TC with all counsel re: settlement
02/14/08	JRH	0.25	\$ 375.00	\$ 93.75	Review decisions provided by defendants on remand issue
02/21/08	JRH	0.30	\$ 375.00	\$ 112.50	Review Larue opinion
02/22/08	JRH	0.50	\$ 375.00	\$ 187.50	TC among plaintiffs' counsel and bankruptcy counsel re: Solutia bankruptcy and settlement
03/03/08	JRH	2.00	\$ 375.00	\$ 750.00	Review and input Wahle edits to settlement agreement and circulate / Review email from Sarraf re: same
03/04/08	JRH	1.50	\$ 375.00	\$ 562.50	Analyze Wahle edits to settlement agreement / Email to co-counsel re: Wahle's proposed revisions to settlement agreement
03/05/08	JRH	0.50	\$ 375.00	\$ 187.50	TC with co-counsel
03/06/08	JRH	1.00	\$ 375.00	\$ 375.00	TC with Doyle, Sarraf and Gentile re: settlement / TC with Doyle, Sarraf, Gentile, Etkin and Zeiger re: settlement
03/13/08	JRH	0.40	\$ 375.00	\$ 150.00	Review revisions to settlement agreement / Email co-counsel re: same
03/17/08	JRH	0.10	\$ 375.00	\$ 37.50	Review draft letter to Judge Preska and give comments to Sarraf
03/18/08	JRH	1.75	\$ 375.00	\$ 656.25	TC with plaintiffs and defense counsel re: settlement / TC with plaintiffs counsel (.25) following call
03/27/08	JRH	0.50	\$ 375.00	\$ 187.50	Review Doyle revisions to settlement agreement
04/04/08	JRH	0.40	\$ 375.00	\$ 150.00	Review Doyle revisions to settlement agreement
04/15/08	JRH	3.00	\$ 375.00	\$ 1,125.00	Revise settlement agreement to incorporate plan of allocation
04/16/08	JRH	1.00	\$ 375.00	\$ 375.00	Revise settlement exhibits
04/17/08	JRH	4.80	\$ 375.00	\$ 1,800.00	Prepare revised settlement exhibits based on revised stipulation
04/28/08	JRH	4.00	\$ 375.00	\$ 1,500.00	Review and analyze revised settlement agreement and exhibits / prepare email to co-counsel re: agreement / revise class notice, summary notice, preliminary order and final order and circulate with cover email
05/01/08	JRH	0.50	\$ 375.00	\$ 187.50	Dickerson - Review and comment on settlement papers

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Bill Date	Staff	Total Dur	Rate/Price	Billed Amt	Description
05/02/08	JRH	0.10	\$ 375.00	\$ 37.50	Dickerson - TC with Sarraf re: settlement
05/05/08	JRH	1.25	\$ 375.00	\$ 468.75	Review and comment on settlement papers
05/12/08	JRH	0.25	\$ 375.00	\$ 93.75	TC with plaintiff's counsel re settlement
05/13/08	JRH	0.50	\$ 375.00	\$ 187.50	TC with all counsel re settlement / Preparation for TC
05/14/08	JRH	0.40	\$ 375.00	\$ 150.00	Review settlement papers re remand issue / Email Sarraf re same
05/15/08	JRH	1.25	\$ 375.00	\$ 468.75	Review and analyze draft settlement papers
05/16/08	JRH	1.50	\$ 375.00	\$ 562.50	Review draft settlement papers / Prepare email to co-counsel re: same / Review responses to email
07/14/08	JRH	0.10	\$ 375.00	\$ 37.50	Email Sarraf re class notice / Email E. Doyle re same
07/21/08	JRH	0.25	\$ 375.00	\$ 93.75	Prepare case description for website
07/29/08	JRH	0.25	\$ 375.00	\$ 93.75	TC with Doyle, Ewing and Sarraf re: assignments for preparing papers in support of final approval of settlement
Joel R. Hurt		132.65		\$ 49,743.75	
11/20/07	DPK	1.00	\$ 125.00	\$ 125.00	Prepare copy of 5th amended Joint Plan of Reorganization
12/11/07	DPK	0.50	\$ 125.00	\$ 62.50	Review Pleadings to make sure all are in our file
David P. Kernan		1.50		\$ 187.50	
07/18/07	KLO	1.50	\$ 125.00	\$ 187.50	Went to meeting at E. Doyle's office re: submission for Friday / Read briefs and background reading
Kara L. O'Bryan		1.50		\$ 187.50	
TOTALS		427.40		\$ 185,027.50	